

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

HOOPA VALLEY TRIBE,

Plaintiff,

v.

Case No. 1:20-cv-01814-JLT-EPG

UNITED STATES BUREAU OF  
RECLAMATION; DEBRA ANNE  
HAALAND, in her official capacity as  
Secretary of the Interior; MARIA  
CAMILLE CALIMLIM TOUTON, in her  
official capacity as Commissioner of the  
United States Bureau of Reclamation;  
ERNEST A. CONANT, in his official  
capacity as U.S. Bureau of Reclamation  
California-Great Basin Regional Director;  
and UNITED STATES DEPARTMENT OF  
THE INTERIOR,

Defendants.

**DECLARATION**

I, Donald Bader, declare as follows:

1. I submit this declaration in support of the Federal Defendants' Motion to Dismiss. The following facts are within my personal knowledge.
2. I am employed as the Area Manager for the Northern California Area Office (NCAO) at Shasta Dam, with the U.S. Bureau of Reclamation (Reclamation) in the Department of the Interior.
3. As the Area Manager, I am responsible for securing funding for the annual Operations and Maintenance (O&M) of the Trinity River Hatchery. I negotiate an O&M contract with the California Department of Fish and Wildlife (CDFW), which has performed the O&M since the Trinity River Hatchery first came online in 1963. In addition to my O&M responsibilities, I also oversee any capital improvements that are needed for the hatchery. Due to the age of the Trinity River Hatchery, many capital improvements have been needed to bring it up to present day standards. It was determined a holistic infrastructure upgrade was the best course of action.

4. The initial step in beginning the modernization process for the Trinity River Hatchery was an infrastructure technical review that was completed in September 2022. This technical review is a comprehensive analysis of all the infrastructure upgrades needed to bring the Trinity River Hatchery up to present day standards.
5. Reclamation is requesting substantial funding for the Trinity River Hatchery from the recently enacted Infrastructure Investment and Jobs Act and the Inflation Reduction Act to continue its modernization and maintenance efforts.
6. Reclamation has secured \$2.75M in funding to initiate the upgrades beginning with the Trinity River Hatchery water intake system, and work is scheduled to begin during fiscal year 2023.
7. Additional work identified by the September 2022 infrastructure technical review will be completed as Reclamation receives the funds requested for Trinity River Hatchery restoration from the Infrastructure Investment and Jobs Act and the Inflation Reduction Act and/or other sources of appropriated funds.

I declare under penalty of perjury that the foregoing information is true and correct.

Executed this 13<sup>th</sup> day of January, 2023, in Shasta Lake, California.

  
Donald Bader, NCAO Area Manager